

ROBBINS GELLER RUDMAN
& DOWD LLP
SHAWN A. WILLIAMS (213113)
WILLOW E. RADCLIFFE (200087)
MATTHEW S. MELAMED (260272)
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415/288-4545
415/288-4534 (fax)
shawnw@rgrdlaw.com
willowr@rgrdlaw.com
mmelamed@rgrdlaw.com

MOTLEY RICE LLC
JAMES M. HUGHES (*pro hac vice*)
WILLIAM S. NORTON
CHRISTOPHER F. MORIARTY
28 Bridgeside Blvd.
Mount Pleasant, SC 29464
Telephone: 843/216-9000
843/216-9450 (fax)
jhughes@motleyrice.com
bnorton@motleyrice.com
cmoriarty@motleyrice.com

Co-Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

In re LEAPFROG ENTERPRISES, INC.
SECURITIES LITIGATION

) Master File No. 3:15-cv-00347-EMC
)

) CLASS ACTION
)

This Document Relates To:

ALL ACTIONS.

) STIPULATION AND ~~PROPOSED~~ ORDER
) TO EXTEND THE DEADLINE TO SUBMIT
) A PROPOSED PREMEDIATION
) DISCOVERY PLAN
)

1 Pursuant to Civil Local Rules 6-2 and 7-12, the parties – lead plaintiff KBC Asset
2 Management NV (“Lead Plaintiff”) and defendants LeapFrog Enterprises, Inc., John Barbour, and
3 Raymond L. Arthur (“Defendants”) – by and through their undersigned counsel of record, submit the
4 following stipulation and proposed order:

5 WHEREAS, on multiple occasions the Court has granted the parties’ stipulated request to
6 continue the scheduled Initial Case Management Conference (“CMC”) so that it is held at the same
7 time as hearings on Defendants’ motions to dismiss (Dkt. Nos. 49, 69, 96, 99, 108);

9 WHEREAS, the Court’s February 24, 2017 Order Granting in Part and Denying in Part
10 Defendants’ Motion to Dismiss (Dkt. No. 117) scheduled a CMC for April 6, 2017;

11 WHEREAS, a CMC was held on April 6, 2017 (Dkt. No. 123), wherein the Court directed
12 the parties to meet and confer regarding a pre-mediation discovery plan to submit by stipulation to
13 the Court by April 20, 2017 (Dkt. No. 123);

14 WHEREAS, the parties are continuing to discuss a private mediator for this action and an
15 appropriate pre-mediation discovery plan;

16 WHEREAS, the parties have conferred and agreed, subject to Court approval, that an
17 additional week to confer regarding an appropriate pre-mediation discovery plan to submit to the
18 Court is necessary;

19 NOW, THEREFORE, the parties hereby agree and stipulate that the parties will submit a pre-
20 mediation discovery plan to the Court by April 27, 2017.

21 DATED: April 18, 2017

22 ROBBINS GELLER RUDMAN
23 & DOWD LLP
24 SHAWN A. WILLIAMS
25 WILLOW E. RADCLIFFE
26 MATTHEW S. MELAMED

27 s/ Matthew S. Melamed
28 MATTHEW S. MELAMED

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Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415/288-4545
415/288-4534 (fax)

MOTLEY RICE LLC
JAMES M. HUGHES
WILLIAM S. NORTON
CHRISTOPHER F. MORIARTY
28 Bridgeside Blvd.
Mount Pleasant, SC 29464
Telephone: 843/216-9000
843/216-9450 (fax)

Co-Lead Counsel for Plaintiffs

DATED: April 18, 2017

MORRISON & FOERSTER
JORDAN ETH
MARK R.S. FOSTER

s/ Mark R.S. Foster
MARK R.S. FOSTER

425 Market Street
San Francisco, CA 94105-2482
Telephone: 415/268-7000
416/268-7522 (fax)

Attorneys for Defendants

1 I, Matthew S. Melamed, am the ECF User whose ID and password are being used to file this
2 Stipulation and [Proposed] Order to Extend the Deadline to Submit a Proposed Premediation
3 Discovery Plan. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that Mark R.S. Foster
4 has concurred in this filing.

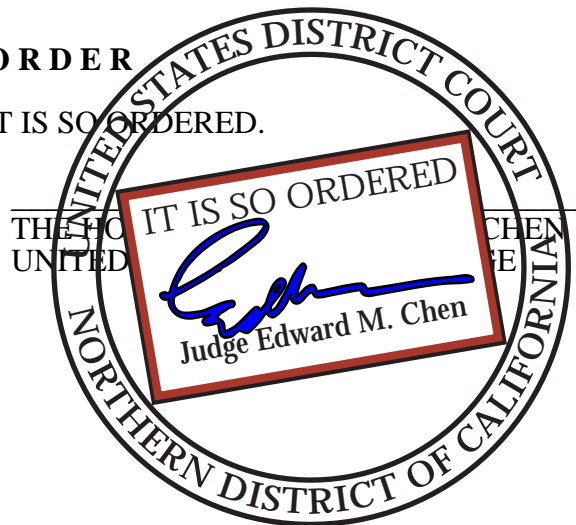
5 s/ Matthew S. Melamed
6 MATTHEW S. MELAMED

7
8 * * *

9 **ORDER**

10 PURSUANT TO STIPULATION, IT IS SO ORDERED.

11 DATED: 4/19/17



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I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 18, 2017.

**ROBBINS GELLER RUDMAN
& DOWD LLP**
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415/288-4545
415/288-4534 (fax)
E-mail: mmelamed@rgrdlaw.com

Mailing Information for a Case 3:15-cv-00347-EMC In Re: LeapFrog Enterprise, Inc. Securities Litigation

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Ramzi Abadou**
ramzi.abadou@ksfcounsel.com,dawn.hartman@ksfcounsel.com
- **Jordan Eth**
jeth@mofo.com,gerri-martinez-2359@ecf.pacerpro.com,jordan-eth-3756@ecf.pacerpro.com,gmartinez@mofo.com,jrahman@mofo.com
- **Mark R.S. Foster**
mfoster@mofo.com,lroiz@mofo.com,linda-roiz-3645@ecf.pacerpro.com,mark-rs-foster-7528@ecf.pacerpro.com,kmaccardle@mofo.com,rbarajas@mofo.com
- **James Michael Hughes**
jhughes@motleyrice.com,erichards@motleyrice.com,kweil@motleyrice.com
- **Jeremy A Lieberman**
jalieberman@pomlaw.com,disaacson@pomlaw.com,abarbosa@pomlaw.com,lpvega@pomlaw.com
- **Matthew Seth Melamed**
mmelamed@rgrdlaw.com,e_file_SF@rgrdlaw.com,e_file_SD@rgrdlaw.com
- **Christopher Francis Moriarty**
cmoriarty@motleyrice.com
- **Brian O. O'Mara**
bo'mara@rgrdlaw.com,e_file_sd@rgrdlaw.com,e_file_sf@rgrdlaw.com
- **Robert Vincent Prongay**
rprongay@glancylaw.com,info@glancylaw.com,echang@glancylaw.com,bmurray@glancylaw.com
- **Willow E. Radcliffe**
willowr@rgrdlaw.com,ptiffith@rgrdlaw.com,mmelamed@rgrdlaw.com,katerinap@rgrdlaw.com,e_file_sd@rgrdlaw.com,e_file_sf@rgrdlaw.com
- **Shawn A. Williams**
shawnw@rgrdlaw.com,e_file_sd@rgrdlaw.com,e_file_sf@rgrdlaw.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)